

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF FEDERAL
CHARLOTTE DIVISION
Civil Action No. 3:25-cv-220

INTEGRITY ENVIRONMENTAL)
SOLUTIONS, LLC, and JJAM)
STAND, LLC)
)
Plaintiffs,)
)
v.)
)
MATTHEW OUTLAW,)
)
Defendant.)
_____)

**JOINT MOTION FOR ENTRY
OF PROTECTIVE ORDER**

The parties hereby jointly move the Court, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, to enter the proposed protective order attached hereto and incorporated by reference as **Exhibit A**. Plaintiffs and Defendant acknowledge that the parties may seek information or documents through discovery that are or may be considered to be confidential by another party, and that the documents to be exchanged may also include some highly confidential documents that need to be designated “Attorneys’ Eyes Only.” This Court’s standing protective order does not provide for an “Attorneys Eyes Only” designation. Accordingly, the parties have stipulated and agreed for purposes of the above-captioned litigation to the proposed protective order attached as Exhibit A and respectfully move the Court for entry of this proposed protective order.

WHEREFORE, the parties jointly move the Court for entry of their agreed upon protective order (Exhibit A).

This the 8th day of October, 2025.

/s/ G. Bryan Adams III

G. Bryan Adams III
VAN HOY, REUTLINGER, ADAMS,
PIERCE & TISDALE, PLLC
737 East Blvd.
Charlotte, NC 28203
Telephone: 704-375-6022
Fax: 704-375-6024
Email: bryan.adams@vraptlaw.com

Attorneys for Plaintiff

s/ Elizabeth Venum

Elizabeth Venum
HULL & CHANDLER, P.A.
1009 East Boulevard
Charlotte, NC 28203
Telephone: 704-375-8488
Fax: 704-375-8487
Email: IVENNUM@lawyercarolina.com

Attorneys for Defendant

